## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BOKF, N.A., solely in its capacity as successor Indenture Trustee for the 12.75% Second-Priority Senior Secured Notes due 2018,

Case No. 1:15-cv-01561 (SAS)

Plaintiff,

 $\mathbf{v}_{\bullet}$ 

CAESARS ENTERTAINMENT CORPORATION,

Defendant.

UMB BANK, N.A. solely in its capacity as Indenture Trustee under those certain indentures, dated as of June 10, 2009, governing Caesars Entertainment Operating Company, Inc.'s 11.25% Notes due 2017; dated as of February 14, 2012, governing Caesars Entertainment Operating Company, Inc.'s 8.5% Senior Secured Notes due 2020; dated August 22, 2012, governing Caesars Entertainment Operating Company, Inc.'s 9% Senior Secured Notes due 2020; dated February 15, 2013, governing Caesars Entertainment Operating Company, Inc.'s 9% Senior Secured Notes due 2020,

Case No. 1:15-cv-04634 (SAS)

Plaintiff,

v.

CAESARS ENTERTAINMENT CORPORATION,

Defendant.

PLEASE TAKE NOTICE that upon this Notice of Motion; the accompanying Memorandum of Law; the supporting Second Declaration of Andrew I. Silfen, dated February 5, 2016 and the exhibits thereto; and all other papers and proceedings in this action, plaintiff in the first above-captioned action, BOKF, N.A. ("BOKF")<sup>1</sup> and plaintiff in the second above-captioned action, UMB Bank, N.A. ("UMB,"<sup>2</sup> and together with BOKF, the "Trustees") by and through their respective counsel, Arent Fox LLP and Katten Muchin Rosenman LLP, will respectfully move this Court, in Courtroom 15C of the United States Courthouse located at 500 Pearl Street, New York, New York 10007, before the Honorable Shira A. Scheindlin, U.S.D.J., at a time to be determined by the Court, pursuant to Federal Rules of Evidence 401, 402, 403, 701, and the local rules of this Court, for an order granting their omnibus motions *in limine* numbered 1 through 4.

## Respectfully submitted,

Dated: New York, New York February 5, 2016 /s/ Andrew I. Silfen

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<sup>&</sup>lt;sup>1</sup> BOKF appears solely in its capacity as successor Indenture Trustee for the 12.75% Second-Priority Senior Secured Notes due 2018 (the "Second Lien Notes").

<sup>&</sup>lt;sup>2</sup> UMB appears solely in its capacity as Indenture Trustee under those certain indentures, as amended and supplemented, dated as of June 10, 2009, governing Caesars Entertainment Operating Company, Inc.'s ("CEOC's") 11.25% Senior Secured Notes due 2017; dated as of February 14, 2012, governing CEOC's 8.5% Senior Secured Notes due 2020; dated August 22, 2012, governing CEOC's 9% Senior Secured Notes due 2020; and dated February 15, 2013, governing CEOC's 9% Senior Secured Notes due 2020 (the "First Lien Notes," and together with the Second Lien Notes, the "Notes").

## -and-

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Attorneys for BOKF, N.A., solely in its capacity as successor Indenture Trustee under the Indenture governing the Second Lien Notes

## /s/ David A. Crichlow

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Attorneys for Plaintiff UMB Bank, N.A. solely in its capacity as successor Indenture Trustee under the Indentures governing the First Lien Notes